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U.S. DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIV DAYTON

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

UNITED STATES OF AMERICA,

CASE NO. 3:22CR045

Plaintiff,

JUDGE THOMAS M. ROSE

v.

MARQUIS DESADE FARMER, (1)
(Counts 1-8, 12-16; 20-23)

SUPERSEDING INDICTMENT

7 U.S.C. § 2024(b)

18 U.S.C. § 2

18 U.S.C. § 371

18 U.S.C. § 641

18 U.S.C. § 922(g)(1)

18 U.S.C. § 1028A

18 U.S.C. §§ 1029(a)(2) and (a)(3)

18 U.S.C. § 1343

42 U.S.C. § 1383a(a)(3)

FORFEITURE

CATHY CHARLENE FARMER, (2)
(Counts 3, 9-11, 17-19)

JOYCE SAULSBERRY, (3)
(Count 3)

RAHSHEEDA FARMER (4)
(Counts 3)

Defendants.

THE GRAND JURY CHARGES THAT:

COUNT 1

[7 U.S.C. § 2024(b)]

(SNAP Fraud)

1. Between on or about December 5, 2021 and December 8, 2021, while in the Southern District of Ohio, defendant **MARQUIS DESADE FARMER**, did knowingly acquire, possess and use a USDA SNAP electronic benefits transfer (EBT) access device, to wit: an "Oregon Trail" EBT card bearing account number ending in #7592, as defined by 7 U.S.C. § 2012 (a) and (i) having a value of \$100 or more, in a manner not authorized by 7 U.S.C., Chapter 51 and the regulations issued pursuant thereto (7 C.F.R. §§ 271-285) in that he knowingly, fraudulently and

unlawfully acquired, possessed and used said SNAP EBT access device, to unlawfully acquire various food items and other commodities.

In violation of 7 U.S.C. § 2024(b).

COUNT 2
[18 U.S.C. §§ 922(g)(1) and 924(a)(2)]
(Felon in Possession of a Firearm)

2. On or about April 12, 2022, in the Southern District of Ohio, defendant **MARQUIS DESADE FARMER**, knowing he had previously been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed a firearm and ammunition and the firearm was in and affecting commerce.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

COUNT 3
[18 U.S.C. § 371]
(Conspiracy)

INTRODUCTION

3. The Supplemental Nutrition Assistance Program (SNAP), formerly known as the Food Stamp Program (FSP), is a federally funded national nutrition aid program administered by the United States Department of Agriculture (USDA) through its Food and Nutrition Service (FNS). SNAP is a “means tested” entitlement program intended to help alleviate hunger and malnutrition while strengthening the nation’s agriculture economy.

4. Between 1939 and 2001, FSP beneficiaries were issued paper coupons in order to acquire low, or no cost food for themselves and families. In 2001, the FSP transitioned from the paper coupon system to the current Electronic Benefit Transfer (EBT) system of access devices. EBT cards, which are similar to commercial debit cards, are now issued to eligible SNAP recipients to distribute monthly benefits.

5. Since the passage of the Food Stamp Act of 1964, (7 U.S.C. §§ 2001 *et seq.*), the day-to-day administration of the SNAP Program has been delegated to the individual states. In the State of Ohio, the Department of Job and Family Services (ODJFS) is tasked with administering the program; in the State of Oregon, the Department of Human Services (ODHS) is tasked with administering the program; and in the State of Washington, the Department of Social and Health Services (WDSHS) is tasked with administering the program.

6. ODJFS issues SNAP recipients *Ohio Direction EBT* Cards; ODHS issues SNAP recipients *Oregon Trail EBT* Card; and WDSHS issues SNAP recipients *Washington Quest EBT* Cards. Each month, respective state social service agencies directly deposit federal monies into authorized recipients' SNAP EBT card accounts to subsidize food purchases at supermarkets, convenience stores, and other food retailers including farmers' markets. Individual state issued SNAP EBT cards are legally honored nation-wide by authorized food retailers/vendors.

7. With the passage of the 2008 Farm Bill, the SNAP program formally replaced the original FSP.

8. Pursuant to the Food and Nutrition Act of 2008, SNAP recipients are permitted to exchange their benefits for specific "eligible food items". Federal regulations, 7 C.F.R. §§ 271.2, 278.2(a), legally prohibit SNAP benefits from being exchanged, redeemed or bartered for cash, alcoholic beverages, tobacco, or any other non-food items.

9. The FNS issues licenses to retail food stores which allow them to accept SNAP EBT cards from authorized recipients for the purchase of approved food products.

10. SNAP transactions are electronically completed via EBT processing equipment commonly referred to as a Point of Sale (POS) devices.

11. These POS devices automatically are linked up with U.S. Government contractor data processing systems automatically debit SNAP recipients' EBT card balances whenever food items are purchased, and in-turn electronically remit reimbursement payments to authorized SNAP vendors.

12. All SNAP EBT transactions originating in Ohio are processed by a central computer data base operated by *Conduent Government Solutions*, a U.S. Government contractor located in Austin, Texas.

13. From on or about March 2016 and continuing through on or about April 12, 2022, both dates being approximate and inclusive, while in the Southern District of Ohio and elsewhere, the defendants **MARQUIS DESADE FARMER**, **CATHY CHARLENE FARMER**, **JOYCE SAULSBERRY** and **RAHSHEEDA FARMER**, together with other individuals, both known and unknown to the Grand Jury, did knowingly, voluntarily and unlawfully combine, conspire, confederate, and agree by and between themselves, to accomplish a common unlawful plan, scheme and artifice to defraud the U.S. Government of money in the form of SNAP benefits and property, through the use of false and fraudulent pretenses, representations and promises. These said individuals unlawfully transferred, acquired, possessed, trafficked and used stolen personal identification information to illicitly apply for, and acquire SNAP EBT access devices and benefits, moneys and reimbursements.

14. During the aforesaid said time frame, while in the Southern District of Ohio and elsewhere, defendants **MARQUIS DESADE FARMER**, **CATHY CHARLENE FARMER**, **JOYCE SAULSBERRY** and **RAHSHEEDA FARMER**, together with other individuals, both known and unknown to the Grand Jury, did knowingly, voluntarily and unlawfully combine, conspire, confederate, and agree by and between themselves, to defraud the United States and commit certain offenses against the United States to include:

- a. The illegal acquisition, possession, use and trafficking of SNAP benefits in violation of 7 U.S.C. § 2024(b);
- b. The theft and conversion of U. S. Government property in violation of 18 U.S.C. § 641;
- c. The submission of false claims to the United States in violation of 18 U.S.C. § 287;
- d. Mail fraud in violation of 18 U.S.C. § 1341;
- e. Wire fraud in violation of 18 U.S.C. § 1343;
- f. Access device fraud in violation of 18 U.S.C. § 1029(a); and.
- g. Aggravated identity theft in violation of 18 U.S.C. § 1028A.

OBJECTS OF THE CONSPIRACY

15. It was an object of the conspiracy for the conspirators to illegally and fraudulently acquire, possess, transfer, use and otherwise traffic in SNAP benefits obtained through fraudulently acquired EBT access devices issued from social service agencies located in various states to include: Ohio, Oregon, Washington, Arizona, Alabama, Hawaii, Illinois, Massachusetts, Oklahoma, Nevada, Pennsylvania, Texas, Alabama and North Carolina.

16. It was further an object of this conspiracy for the conspirators to conceal, disguise and insulate their respective roles in carrying out aforesaid criminal scheme from federal and state regulatory authorities, law enforcement officials and prosecution authorities.

17. It was further an object of the conspiracy for the conspirators to enjoy the benefits of said criminal proceeds generated through their individual and corporate conspiratorial activities while simultaneously insulating themselves from detection by law enforcement and prosecution authorities.

THE MANNER AND MEANS

18. During all times relevant to Count 3 of this indictment, the defendants **MARQUIS DESADE FARMER, CATHY CHARLENE FARMER, JOYCE SAULSBERRY and RAHSHEEDA FARMER** illicitly acquired third party personal identification information (PPI) and means of identification to include: names, social security numbers, dates of birth, and residential addresses.

19. This illicitly acquired means of identification originated from a variety of sources to include: Ohio state penitentiaries, Ohio county jails, homeless shelters and various “dark websites” accessed on the internet.

20. The aforesaid defendants would use this illicitly acquired means of identification to falsely and fraudulently prepare, complete state SNAP benefit application forms.

21. These state SNAP benefit application forms would commonly reflect defendant **MARQUIS DESADE FARMER's** personal cell phone number(s) as a point of contact in the event officials from the respective state agencies desired to personally follow-up with the purported “applicant” referenced on the fraudulently prepared and submitted form(s).

22. The aforesaid defendants would thereafter transmit or cause to be transmitted these fraudulent state SNAP benefit application forms to various state agencies to include ODHS and WDSHS via a variety of means of electronic interstate communication to include data fax and e-mail messages. This electronic communication would be transmitted from various locations within the Southern District of Ohio and directed to various out-of-state agencies, to include Oregon and Washington State.

23. Upon receipt of these fraudulent SNAP benefit application forms, the respective state agencies to include ODJFS, ODHS and WDSHS would review and commonly approve the applications and return via the U.S. Mails state issued SNAP EBT access devices addressed to the

fraudulent address(es) previously provided by the defendants on their SNAP application forms. The defendants would thereafter arrange to collect these mailed SNAP EBT access devices directly or through trusted intermediaries, associates, collaborators.

24. After collecting these fraudulently acquired SNAP EBT cards the conspirators would cause these SNAP EBT cards to be illicitly and fraudulently trafficked and used to acquire unauthorized retail food, retail merchandise, cash and credit, all in violation of federal law and regulations.

25. From on or about March 2016 and continuing until on or about April 12, 2022, both dates being approximate and inclusive, the defendants **MARQUIS DESADE FARMER**, **CATHY CHARLENE FARMER**, **JOYCE SAULSBERRY** and **RAHSHEEDA FARMER**, together with other unnamed co-conspirators, directly and indirectly caused in excess of 200 separate fraudulent SNAP EBT applications to be submitted to various state agencies; in-turn fraudulently obtained in excess of 200 SNAP EBT access device cards issued by various state agencies; directly and indirectly caused in excess of 100,000 false and fraudulent individual SNAP EBT access device transactions to be completed having an aggregate value exceeding \$550,000 in U.S. Government monies.

OVERT ACTS

- a. On or about October 2, 2018, the defendant **MARQUIS DESADE FARMER** fraudulently caused to be filed with the Oregon DHS an application for SNAP benefits in the name of "D.G.". This application used the email address of 1prettiblag@gmail.com. This email address had been tied to other SNAP applications that the defendant **MARQUIS DESADE FARMER** used to fraudulently file SNAP applications with the Washington State DSHS.
- b. On or about August 25, 2021, the defendant **MARQUIS DESADE FARMER** entered a Columbus, Ohio Public Library Branch located at 3434 E. Livingston Avenue to transmit fraudulent SNAP application related documents to the Oregon DHS.

- c. On or about September 2, 2021, the defendant **MARQUIS DESADE FARMER** entered a Columbus, Ohio Public Library Branch located at 3434 E. Livingston Avenue to transmit fraudulent SNAP application related documents to the Oregon DHS.
- d. On or about September 3, 2021, the defendant **MARQUIS DESADE FARMER** faxed multiple fraudulent SNAP application related documents from the said 3434 E. Livingston Avenue Public Library to Oregon DHS.
- e. On or about September 14, 2021, the defendant **MARQUIS DESADE FARMER** faxed multiple fraudulent SNAP application related documents from the said 3434 E. Livingston Avenue Public Library to Oregon DHS.
- f. On or about December 5, 2021, the defendant **MARQUIS DESADE FARMER** fraudulently used a State of Oregon SNAP EBT card no. 7592 in the name of "B.L." and made a single transaction at a Wal-Mart Store located at 3657 E. Main Street, Whitehall, Ohio in the amount of \$2.00.
- g. On or about December 5, 2021, the defendant **MARQUIS DESADE FARMER** fraudulently used a State of Oregon SNAP EBT card no. 7592 in the name of "B.L." and made a single transaction at a Kroger Grocery Store located at 2000 E. Main Street, Whitehall, Ohio in the amount of \$36.27.
- h. On or about April 12, 2022, the defendant **MARQUIS DESADE FARMER** illegally possessed at least one hundred fifty-one (151) stolen "check-in" Faith Mission cards. Each card contained personal identification information of individual residents to include: names, dates of birth, social security numbers and a photocopy of a personal identification card.
- i. On or about February 20, 2022, the defendant **JOYCE SAULSBERRY** texted defendant **MARQUIS DESADE FARMER** a picture of an Oregon SNAP EBT card no. 1575.
- j. On or about March 22, 2022, the defendant **JOYCE SAULSBERRY** texted defendant **MARQUIS DESADE FARMER** a picture of an Oregon SNAP EBT card no. 3750 bearing the name of "J.J.". The text contained the written message "Call this is, not to report it, check the balance."
- k. On or about January 24, 2022, the defendant **RASHEEDA FARMER** used a State of Washington EBT card no 6430 fraudulently issued in the name of "P.C." to purchase items at Wal-Mart, 3450 FM 1960 Road W, Houston, Texas 77068 in the amount of \$34.82 with an ending balance of \$687.77.
- l. On or about January 24, 2022, the defendant **RASHEEDA FARMER** fraudulently used a State of Washington EBT card no 6430 issued in the name of "P.C." to purchase items at Wal-Mart, 155 Louetta Xing, Spring, Texas 77373 in the amount

of \$18.70 with an ending balance of \$664.07.

- m. On or about February 23, 2022, an on-line account profile belonging to the defendant **RASHEEDA FARMER** was used to purchase food items from Wal-Mart with the items shipped directly to the residence of defendant **CATHY CHARLENE FARMER**, 2183 Margo Road, Columbus, Ohio. Washington State EBT card no. 6430 issued in the name “P.C.” was fraudulently used in said transaction as payment for the three (3) on-line EBT transactions that totaled \$68.34.
- n. On or about February 25, 2022, defendant **RASHEEDA FARMER** fraudulently used a State of Washington EBT card no. 6430 issued in the name of “P.C.” at a Wal-Mart, located in Spring, Texas in the amount of \$15.66 with an ending balance of \$317.73.
- o. On or about March 2, 2022, an on-line account profile belonging to the defendant **RASHEEDA FARMER** was used to purchase food items from Wal-Mart with the items shipped directly to the residence of defendant **CATHY CHARLENE FARMER**, 2183 Margo Road, Columbus, Ohio. Washington State EBT card no. 6430 which was issued in the name “P.C.” was fraudulently used as payment for the three (3) related on-line EBT transactions that totaled \$16.78.
- p. On or about October 23, 2021, the defendant **CATHY CHARLENE FARMER** fraudulently used State of Washington EBT card no. 6430 issued in the name of “P.C.” at Wal-Mart, 3657 E. Main Street, Whitehall, Ohio 43213 in the amount of \$1.42 with an ending balance of \$543.49.
- q. On or about October 23, 2021, the defendant **CATHY CHARLENE FARMER** fraudulently used State of Washington EBT card no. 6430 issued in the name of “P.C.” at Wal-Mart, 3657 E. Main Street, Whitehall, Ohio 43213 in the amount of \$34.09 with an ending balance of \$544.91.
- r. On or about December 3, 2021, the defendant **CATHY CHARLENE FARMER** fraudulently used State of Washington EBT card no. 1835 issued in the name of “M.M.” at Wal-Mart, 3657 E. Main Street, Whitehall, Ohio 43213 in the amount of \$5.64 with an ending balance of \$0.00.
- s. On or about December 29, 2021, the defendant **CATHY CHARLENE FARMER** sent a text message to defendant **MARQUIS DESADE FARMER** referenced as “\$_!<Other>!\$_” concerning Alabama EBT card no. 5248. This card was issued in the name of “D.W.” and referenced as “expired” in the text narrative with an accompanying photograph of said EBT card.
- t. On or about January 25, 2022, the defendant **CATHY CHARLENE FARMER** sent a string of text messages to defendant **MARQUIS DESADE FARMER**

referenced as “\$_!<Other>!\$” concerning “dead” Washington and Oregon EBT cards.

u. On or about February 11, 2022, the defendant **CATHY CHARLENE FARMER** sent a picture of Pennsylvania EBT card no. 7009 fictitiously issued in the name of “R.G.”, to defendant **MARQUIS DESADE FARMER**, referenced as “\$_!<Other>!\$”.

All in violation of Title 18, United States Code § 371.

COUNTS 4 - 11
[18 U.S.C. §§ 1343 and 2]
(Wire Fraud)

26. The Grand Jury hereby reiterates the allegations contained in paragraphs 3 - 25 of this indictment as if they were fully reproduced herein.

27. On or about the dates set forth in the schedule below, while in the Southern District of Ohio, and elsewhere, having devised a scheme and artifice to defraud the SNAP program of money, benefits and other property by means of false and fraudulent pretenses, representations and promises, by unlawfully acquiring, possessing, bartering and using a SNAP EBT access devices, defendants **MARQUIS DESADE FARMER** and **CATHY CHARLENE FARMER**, for the purpose of executing and attempting to execute the aforesaid scheme and artifice to defraud did knowingly cause to be electronically transmitted in interstate commerce from a POS device maintained at an authorized SNAP vendor’s premises certain wire communications, certain signs, signals and sounds involving fraudulent SNAP retail transactions to a central computer data base maintained by Conduent, a U.S. Government contractor located in Austin, Texas.

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Vendor/Location</u>	<u>Amount</u>	<u>Issuing State</u>	<u>Last Four Acct #</u>	<u>Name Appearing on Card</u>
4	MF	9/24/21	Walmart 3657 E. Main Street Whitehall, OH	\$2.33	OR	1856	D.F.
5	MF	10/3/2021	Walmart 3657 E. Main Street Whitehall, OH	\$1.97	OR	1856	D.F.
6	MF	12/5/21	Walmart 3657 E. Main Street Whitehall, OH	\$2.00	OR	7592	B.L.
7	MF	12/5/21	Kroger 200 E. Main Street Columbus, OH	\$36.27	OR	7592	B.L.
8	MF	12/8/21	Walmart 3657 E. Main Street Whitehall, OH	\$17.17	OR	7592	B.L.
9	CF	10/23/21	Walmart 3657 E. Main Street Whitehall, OH	\$1.42	WA	6430	P.C.
10	CF	12/3/21	Walmart 3657 E. Main Street Whitehall, OH	\$5.64	OR	1835	M.M.
11	CF	12/3/21	Walmart 3657 E. Main Street Whitehall, OH	\$17.56	OR	1835	M.M.

In violation of Title 18 United States Code §§ 1343 and 2.

COUNTS 12-19
[18 U.S.C. §§ 641 and 2]
(Theft of U.S. Government Property)

28. The Grand Jury hereby reiterates the allegations contained in paragraphs 3 - 25 of this indictment as if they were fully reproduced herein.

29. On or about the dates set forth in the schedule below, while in the Southern District of Ohio, and elsewhere, defendants **MARQUIS DESADE FARMER** and **CATHY CHARLENE FARMER**, did willfully and knowingly steal, purloin and convert to their respective use, the following listed amounts of money legally owned by the United States, or a department or agency thereof, namely the U.S. Department of Agriculture's Food and Nutrition Service, in the form of SNAP Benefits that they were not legally authorized or entitled to receive.

<u>Count</u>	<u>Defendant</u>	<u>Date</u>	<u>Vendor/Location</u>	<u>Amount</u>	<u>Issuing State</u>	<u>Last Four Acct #</u>	<u>Name Appearing on Card</u>
12	MF	9/24/21	Walmart 3657 E. Main Street Whitehall, OH	\$2.33	OR	1856	D.F.
13	MF	10/3/2021	Walmart 3657 E. Main Street Whitehall, OH	\$1.97	OR	1856	D.F.
14	MF	12/5/21	Walmart 3657 E. Main Street Whitehall, OH	\$2.00	OR	7592	B.L.
15	MF	12/5/21	Kroger 200 E. Main Street Columbus, OH	\$36.27	OR	7592	B.L.
16	MF	12/8/21	Walmart 3657 E. Main Street Whitehall, OH	\$17.17	OR	7592	B.L.
17	CF	10/23/21	Walmart 3657 E. Main Street Whitehall, OH	\$1.42	WA	6430	P.C.

18	CF	12/3/21	Walmart 3657 E. Main Street Whitehall, OH	\$5.64	OR	1835	M.M.
19	CF	12/3/21	Walmart 3657 E. Main Street Whitehall, OH	\$17.56	OR	1835	M.M.

In violation of Title 18, United States Code §§ 641 and 2.

COUNT 20
[18 U.S.C. § 1029(a)(2)]
(Access Device Fraud)

30. The Grand Jury hereby reiterates the allegations contained in paragraphs 3 - 25 of this indictment as if they were fully reproduced herein.

31. On or about the dates set forth in the schedule below, while in the Southern District of Ohio, and elsewhere, defendant **MARQUIS DESADE FARMER**, did knowingly and with intent to defraud, without lawful authority use one or more SNAP EBT access devices of another person, as defined in 18 U.S.C. § 1029(e)(3), during a one-year period to obtain things of value, having an aggregate value in excess of \$1,000, thereby affected interstate commerce.

<u>Date</u>	<u>Vendor/Location</u>	<u>Amount</u>	<u>Issuing State</u>	<u>Last Four Acct #</u>	<u>Name Appearing on Card</u>
11/21/19	Wal-Mart 3657 E. Main Street Columbus, OH	\$44.00	Ohio	5243	R.W.
12/21/19	Speedy Mart 3377 R. Livingston Avenue Columbus, OH	\$5.07	Ohio	5243	R.W.
12/21/19	Wal-Mart 3657 E. Main Street Columbus, OH	\$38.77	Ohio	5243	R.W.
1/20/20	Wal-Mart	\$73.16	Ohio	5243	R.W.

	Whitehall, OH				
3/28/20	Wal-Mart 2793 Taylor Road Reynoldsburg, OH	\$20.77	Ohio	5243	G.W.
4/4/20	Kroger 4485 Refugee Road Columbus, OH	\$65.26	Ohio	5243	G.W.
4/4/20	Marathon 4755 Refugee Road Columbus, OH	\$12.51	Ohio	5243	G.W.
4/4/20	Kroger 4485 Refugee Road Columbus, OH	\$34.92	Ohio	5243	G.W.
4/4/20	Dollar Tree 4475 Refugee Road Columbus, OH	\$23.00	Ohio	5243	G.W.
4/6/20	Kroger 850 S. Hamilton Road Whitehall, OH	\$33.163	Ohio	5243	G.W.
4/6/20	Kroger 850 S. Hamilton Road Whitehall, OH	\$52.80	Ohio	5243	G.W.
4/9/20	Dollar General 5001 Chatterton Road Columbus, OH	\$2.00	Ohio	5243	G.W.
4/10/20	Kroger 6580 E. Main Street Reynoldsburg, OH	\$31.91	Ohio	5243	G.W.
4/10/20	Kroger 6580 E. Main Street Reynoldsburg, OH	\$86.40	Ohio	5243	G.W.
5/12/20	Kroger 4485 Refugee Road Columbus, OH	\$58.54	Ohio	5243	G.W.

5/15/20	Speedway 4901 E. Main Street Columbus, OH	\$13.43	Ohio	5243	G.W.
5/20/20	Family Dollar 5524 E. Main Street Columbus, OH	\$6.75	Ohio	5243	G.W.
5/21/20	Save-A-Lot 6300 E. Livingston Ave. Reynoldsburg, OH	\$61.88	Ohio	5243	G.W.
6/2/20	Wal-Mart 3657 E. Main Street Columbus, OH	\$66.17	Ohio	5243	G.W.
6/20/20	Sams Club 2675 Taylor Road Reynoldsburg, OH	\$58.90	Ohio	5243	G.W.
6/20/20	Wal-Mart Columbus, OH	\$148.54	Ohio	5243	G.W.
8/8/20	Kroger 4485 Refugee Road Columbus, OH	\$105.14	Ohio	5243	G.W.
8/15/20	Sams Club Reynoldsburg, OH	\$85.64	Ohio	5243	G.W.
8/23/20	Kroger 4485 Refugee Road Columbus, OH	\$63.77	Ohio	5243	G.W.
8/29/20	Food Mart 5435 E. Livingston Road Columbus, OH	\$3.59	Ohio	5243	G.W.
9/2/20	Kroger 300 S. Hamilton Road Gahanna, OH	\$10.92	Ohio	5243	G.W.
9/3/20	Kroger 300 S. Hamilton Road Gahanna, OH	\$5.84	Ohio	5243	G.W.
9/7/20	Giant Eagle	\$34.78	Ohio	5243	G.W.

3841 S. Hamilton Road
Columbus, OH

10/12/20	Kroger 3588 General Road Winchester, OH	\$7.58	Ohio	5243	G.W.
10/25/20	Kroger 4485 Refugee Road Columbus, OH	\$70.00	Ohio	5243	G.W.

In violation of Title 18, United States Code § 1029(a)(2).

COUNT 21
[18 U.S.C. § 1029(a)(3)]
(Access Device Fraud)

32. The Grand Jury hereby reiterates the allegations contained in paragraphs 3 - 25 of this indictment as if they were fully reproduced herein.

33. On or about April 12, 2022, while in the Southern District of Ohio, and elsewhere, defendant **MARQUIS DESADE FARMER**, knowingly and with intent to defraud, possessed the below listed SNAP EBT access devices of another person, which are considered unauthorized access devices as defined in 18 U.S.C. § 1029(e)(2) and (e)(3), and thereby affected interstate commerce.

<u>Issuing State</u>	<u>Last Four Acct #</u>	<u>Name Appearing on Card</u>
OR	1856	D.F.
OR	2533	L.G.
OR	2559	R.E.
OR	4889	D.C.
WA	0371	J.C.

WA	0507	A.D.
WA	0647	T.F.
WA	0903	J.B.
WA	1605	C.K.
WA	2715	L.F.
WA	3692	I.G.
WA	3836	J.J.
WA	4164	E.M.
WA	5138	R.K.
WA	6200	R.H.
WA	6620	M.D.
WA	6621	W.J.
WA	6654	L.B.

In violation of Title 18, United States Code § 1029(a)(3).

COUNT 22
[42 U.S.C. § 1383a(a)(3)]
(Supplemental Security Income Fraud)

34. Between on or about June 1, 2019 and a continuing through on or about December 31, 2021, both dates being approximate and inclusive, while in the Southern District of Ohio, and elsewhere, the defendant **MARQUIS DESADE FARMER**, having knowledge of the occurrence of any event affecting his initial and continued right to receive any benefit under Title 42, Chapter 7, Subchapter XVI of the United States Code, to wit: Supplemental Security Income (SSI) payments, concealed and failed to disclose such event with an intent to fraudulently secure such benefit(s) in a greater amount and quantity than was due and when no such benefit was lawfully

authorized.

In violation of Title 42 United states Code § 1383a(a)(3).

COUNT 23
[18 U.S.C. § 1028A(a)(1)]
(Aggravated Identity Theft)

35. The Grand Jury hereby reiterates the allegations contained in paragraphs 3 - 34 of this indictment as if they were fully reproduced herein.

36. From on or about March 2016 and continuing through on or about April 12, 2022, both dates being approximate and inclusive, while in the Southern District of Ohio, and elsewhere, defendant **MARQUIS DESADE FARMER**, did, without lawful authority, knowingly possess one or more SNAP EBT access devices of another person, which is considered a means of identification, as defined in 18 U.S.C. § 1028(d)(7), to wit: a unique electronic identification number and access device of an individual whose full identity is known to the Grand Jury, during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c)(4), to wit: Theft of U.S. Government Property in violation of 18 U.S.C. § 641 as previously alleged in this indictment, which is incorporated herein by reference.

In violation of Title 18, United State Code § 1028A (a)(1).

FORFEITURE ALLEGATION 1

Upon conviction of Count 1 of this Indictment, defendant **MARQUIS DESADE FARMER** shall forfeit to the United States, pursuant to 7 U.S.C. § 2024(f), all property, real and personal, used in a transaction or attempted transaction, to commit, or to facilitate the commission of, such violation, or proceeds traceable to such violation, including but not limited to a 2010 Mercedes S550, VIN: WDDNG7BB6AA357807, with all attachments thereon.

FORFEITURE ALLEGATION 2

Upon conviction of Count 2 of this Indictment, defendant **MARQUIS DESADE FARMER** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c), any firearms and ammunition, involved in or used in such violation, including but is not limited to a Taurus G28, pistol, serial number ABG693773, with any attachments and ammunition.

FORFEITURE ALLEGATION 3

Upon conviction of Count 3 of this Indictment, defendants **MARQUIS DESADE FARMER, CATHY CHARLENE FARMER, JOYCE SAULSBERRY and RAHSHEEDA FARMER** shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation; pursuant to 7 U.S.C. § 2024(f), all property, real and personal, used in a transaction or attempted transaction, to commit, or to facilitate the commission of, such violation, or proceeds traceable to such violation; pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as a result of such violation; and pursuant to 18 U.S.C. § 1029(c)(1)(C), any personal property used or intended to be used to commit the offense, including but not limited to a 2010 Mercedes S550, VIN: WDDNG7BB6AA357807, with all attachments thereon.

FORFEITURE ALLEGATION 4

Upon conviction of any of the offenses alleged in Counts 4 through 19 of this Indictment, defendants **MARQUIS DESADE FARMER, CATHY CHARLENE FARMER and RAHSHEEDA FARMER** shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, which constitutes or is derived from proceeds traceable to such violation(s), including but not limited to a 2010 Mercedes S550, VIN:

WDDNG7BB6AA357807, with all attachments thereon.

FORFEITURE ALLEGATION 5

Upon conviction of any of the offenses alleged in Counts 20 and/or 21 of this Indictment, defendant **MARQUIS DESADE FARMER** shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly, as the result of such violation(s); and pursuant to 18 U.S.C. § 1029(c)(1)(C), any property used or intended to be used to commit the offense(s), including but not limited to a 2010 Mercedes S550, VIN: WDDNG7BB6AA357807, with all attachments thereon.

SUBSTITUTE ASSETS

If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), or as incorporated by 18 U.S.C. § 982(b)(1), 18 U.S.C. § 1029(c)(2), or 28 U.S.C. § 2461(c), to seek forfeiture of any other property of said defendants, up to the value of the property described above.

A T R U E B I L L
F O R E M A N

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